

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PAUL O'BEIRNE, an individual,

Plaintiff,

v.

TROY STAFFORD, an individual,

Defendant.

No.

COMPLAINT

Plaintiff Paul O'Beirne, by and through his undersigned attorneys, brings this complaint against Defendant Troy Stafford and alleges as follows:

**I. PARTIES**

1. Plaintiff Paul O'Beirne ("O'Beirne") is an individual who resides in and is a citizen of Washington.

2. Defendant Troy Stafford ("Stafford") is an individual who resides in and is a citizen of Texas.

**II. JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction under 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states.



**IV. FIRST CLAIM**

**(Breach of Contract)**

12. O'Beirne repeats and realleges each and every allegation contained above as if fully set forth herein.

13. The loan agreement is a binding contract between O'Beirne and Stafford.

14. Stafford breached the contract by failing timely to pay the funds due under the contract.

15. O'Beirne fully performed all of his obligations under the contract.

16. O'Beirne has suffered damages as a result of Stafford's breach of the contract.

**PRAYER FOR RELIEF**

WHEREFORE, O'Beirne requests the following relief:

A. For damages in an amount to be proven at trial;

B. For the costs of this proceeding, including reasonable attorney's fees and costs;

C. For pre-judgment and post-judgment interest at the maximum applicable rates; and

D. For such further relief as the Court deems just and proper.

DATED: August 19, 2015

**YARMUTH WILSDON PLLC**

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